

Mr. Fritz J. Hurst
LA Dept. of Environmental Quality
Permits Division
POST OFFICE BOX 4313
BATON ROUGE LA 70821-4313

KEMIRA WATER SOLUTIONS, INC.

Part 70 Operating Permit Renewal Application

Acrylamide Plant Permit Number: 2107-V0

Agency Interest Number: 146892

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
KEMIRA WATER SOLUTIONS, INC.\ACRYLAMIDE (AMD) UNIT
PROPOSED PART 70 AIR OPERATING PERMIT RENEWAL/MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on a Proposed Part 70 Air Operating Permit Renewal/Modification for Kemira Water Solutions, Inc., P.O. Box 1924, Mobile, AL 36633 for the Acrylamide (AMD) Unit. **The facility is located at 10800 River Rd. in Waggaman, Jefferson Parish.**

Kemira Water Solution, Inc. requested a permit renewal/modification.

The proposed modification of the AMD Unit is to delete the plant Flare, which follows the plant scrubber. It has become clear that the flare had such a small amount of VOC to abate that continued operation made no environmental sense. The products of combustion being generated far out weighted any gain from reducing emissions.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	-	-	-
SO ₂	0.01	-	- 0.01
NO _x	0.77	-	- 0.77
CO	3.74	-	- 3.74
VOC*	4.06	4.92	+ 0.86

*VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):	
<u>Pollutant</u>	<u>Emissions</u>
Acrylamide	2.54
Acrylonitrile	1.71
Copper (and Compounds)	<0.001
Ethylene Glycol	0.66
Total	4.91
Other VOC (TPY):	0.01
Non-VOC (TPY)	
Ammonia	0.87
Copper (and Compounds)	<0.001

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Tuesday, September 29, 2009.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The application, proposed permit and statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at Jefferson Parish Library-Live Oak Branch, 125 Acadia Drive, Waggaman, LA 70094.

Inquiries or requests for additional information regarding this permit action should be directed to Fritz J. Hurst, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3125.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmailistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tbid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 146892, Permit Number 2107-V1, and Activity Number PER20080001.

Scheduled for publication: Tuesday, August 25, 2009



BOBBY JINDAL
GOVERNOR

HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20080001
Agency Interest No. 146892

Mr. Mike Villers
Vice President Manufacturing
10800 River Road
Westwego, LA 70094

RE: Part 70 Operating Permit Renewal/Modification, Acrylamide (AMD) Unit, Kemira Water Solutions, Inc.,
Waggaman, Jefferson Parish, Louisiana

Dear Mr. Mike Villers:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2014, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2009.

Permit No.: 2107-V1

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN:fjh

c: EPA Region VI

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Acrylamide (AMD) Unit
Agency Interest No.: 146892
Kemira Water Solutions, Inc.
Waggaman, Jefferson Parish, Louisiana**

I. Background

Kemira Water Solutions, Inc, Acrylamide (AMD) Unit , owns and operates an Acrylamide Unit located at the Cytec Fortier Manufacturing Complex. A change of ownership/operator from Cytec Industries Inc. to Kemira Water Solutions, Inc. occurred on October 1, 2006. The Acrylamide (AMD) Unit is an existing chemical manufacturing facility which currently operates under Permit No. 2107-V0 dated September 25, 2003.

This is the Part 70 operating permit for the facility.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by Kemira Water Solutions, Inc. on February 6, 2008, requesting a Part 70 operating permit renewal/modification.

III. Description

Acrylamide (AMD) is produced by the liquid phase hydration of acrylonitrile (AN) in the presence of a palletized, reduced copper catalyst at a reaction temperature of 85 – 120°C and a pressure of 60 to 120 psig. Under normal operating conditions, more than 99.5% of the AN is converted to AMD. Reaction byproducts include acrylic acid and ammonia. These byproducts are not separated from the final product. The capacity is 90 million pounds per year of AMD in a 50% aqueous solution.

The proposed modification of the AMD Unit is to take the flare out of service which follows the plant scrubber (under emission point number 19-79 and EQT001). It has become clear that the flare had such a small amount of VOC to abate that continued operation make no environmental sense. The plant scrubber will stay in service and remain same emission point number 19-79 and EQT0001. The products of combustion being generated far out weighted any gain from reducing emissions.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	-	-	-
SO ₂	0.01	-	- 0.01
NO _x	0.77	-	- 0.77
CO	3.74	-	- 3.74
VOC *	4.06	4.92	+ 0.86

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Acrylamide (AMD) Unit
Agency Interest No.: 146892
Kemira Water Solutions, Inc.
Waggaman, Jefferson Parish, Louisiana**

***VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):**

Pollutant	Emissions
Acrylamide	2.54
Acrylonitrile	1.71
Ethylene Glycol	0.66
Total	4.91
Other VOC (TPY):	0.01
Non-VOC (TPY)	
Ammonia	0.87
Copper (and Compounds)	<0.001

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
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**Acrylamide (AMD) Unit
Agency Interest No.: 146892
Kemira Water Solutions, Inc.
Waggaman, Jefferson Parish, Louisiana**

VI. Public Notice

A notice requesting public comment on the permit was published in The Advocate, Baton Rouge, on <date>, 2009; and in the Times Picayune, <local town>, on <date>, 2009. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Emissions associated with the proposed renewal/modification were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

Dispersion Model Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard (NAAQS))
None	-	-	-

VIII. General Condition XVII Activities

Work Activity	Schedule	Emission Rates - tons				
		PM ₁₀	SO ₂	NO _X	CO	VOC
Sampling Activities	54 samples/day	-	-	-	-	0.01
Startup and Shutdown Activities	NA	-	-	-	-	0.03

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Acrylamide (AMD) Unit
Agency Interest No.: 146892
Kemira Water Solutions, Inc.
Waggaman, Jefferson Parish, Louisiana**

IX. Insignificant Activities

ID No.:	Description	Citation
2-91	Emergency Generator, 102 hp	LAC 33:501.B.5.B.32
91-92	10% Sulfuric Acid Tank, 1000 gallons	LAC 33:501.B.5.A.3
92-92	10% Sodium Hydroxide Tank, 1000 gallons	LAC 33:501.B.5.A.3
94-92	Ethylene Glycol Tank, 6000 gallons	LAC 33:501.B.5.A.3
96-92	Laboratory Hood Vent	LAC 33:501.B.5.A.6
-	Air Conditioning for Control Room, & Offices	LAC 33:501.B.5.B.17
-	Surface Coating of Equipment during Miscellaneous Maintenance & Construction	LAC 33:501.B.5.B.2
-	Miscellaneous Equipment Maintenance	LAC 33:501.B.5.B.3

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Acrylamide (AMD) Unit
 Agency Interest No.: 146892
 Kemira Water Solutions, Inc.
 Waggaman, Jefferson Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																			
		5▲	509	9	11	13	15	2103	2104*	2107	2111	2115	2113	2121*	22	29*	51*	53*	56	59*	
UNF0001	Acrylamide (AMD) Unit	1	1	1	1										1	1	1	1	1	1	
EQT0001	19-79 - AMD Scrubber Stack	1													3						
EQT0002	2-72 - Reactor Catalyst Dust Separator																				
EQT0003	95-92 - Ammonia Side Boiler																				
EQT0004	93-92 - Tank Truck, Tank Car, & Tote Bin Washout and Sumps																		1	2	
EQT0005	90-92 - AMD Process Sump																		2	2	
EQT0006	1-02 - Loading Seal Pot																		1	1	
EQT0007	49-79 - AMD Rich Tank																		2		
EQT0008	50-79 - AMD AN Feed Tank																		2		
EQT0009	21-88 - AMD Stage I Aeration Tank																		2		
EQT0010	22-88 - AMD Stage II Aeration Tank																		2		
EQT0011	22-89 - AMD Lean Water Tank																		2		

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**Acrylamide (AMD) Unit****Agency Interest No: 146892****Kemira Water Solutions, Inc.****Waggaman, Jefferson Parish, Louisiana****X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.:	Description	LAC 33:II, Chapter																		
		5▲	509	9	11	13	15	2103	2104*	2107	2111	2115	2113	2121*	22	29*	51*	53*	56	59*
EQT0012	Preflash - AMD Preflash Surge Tank								2											
EQT0013	Product - AMD Product Surge Tank								2											1
EQT0014	Reactor Tank - AMD Reactor Wash Hold Tank									2										1
EQT 0015	14-84 - AMD Storage Tank 1									2										
EQT 0016	15-84 - AMD Storage Tank 2									2										
EQT 0017	16-84 - AMD Storage Tank 3									2										
EQT 0018	17-84 - AMD Storage Tank 4									2										
EQT 0019	100-89 - AMD Storage Tank 5									2										
EQT 0020	AMD6 - AMD Storage Tank 6									2										
EQT 0021	AMD7 - AMD Storage Tank 7									2										
EQT 0022	AMD8 - AMD Storage Tank 8									2										
EQT 0023	AMD AN Recycle Tank									2								1		
EQT0024	AMD AN Deaerator Tank									2									1	

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Acrylamide (AMD) Unit
Agency Interest No.: 146892
Kemira Water Solutions, Inc.
Waggaman, Jefferson Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III.Chapter																		
		5 ▲	509	9	11	13	15	2103	2104*	2107	2111	2115	2113	2121*	22	29*	51*	53*	56	59*
FUG0002	97-92 - AMD Plant Fugitives														1		1			

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501 C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Acrylamide (AMD) Unit

Agency Interest No.: 146892

Kemira Water Solutions, Inc.

Waggaman, Jefferson Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR						
		A	K	Ka	Kb	Db	Dc	VV	NNN	RRR	A	J	FF	A	F	G	H	HHH	64	68						
UNF001	Acrylamide (AMD) Unit	1						1			1			1	1	1	1	1	1	1						
EQT0001	19-79 - AMD Scrubber Stack										2	2														
EQT0002	2-72 - Reactor Catalyst Dust Separator																									
EQT0003	95-92 - Ammonia Side Boiler																									
EQT0004	93-92 - Tank Truck, Tank Car, & Tote Bin Washout and Sumps																				1					
EQT0005	90-92 - AMD Process Sump																				1					
EQT0006	1-02 - Loading Seal Pot																				1					
EQT0007	49-79 - AMD Rich Tank										2										1					
EQT0008	50-79 - AMD AN Feed Tank										2										1					
EQT0009	21-88 - AMD Stage I Aeration Tank										2										1					
EQT0010	22-88 - AMD Stage II Aeration Tank										2										1					
EQT0011	22-89 - AMD Lean Water Tank										2										1					

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Acrylamide (AMD) Unit
 Agency Interest No.: 146892
 Kemira Water Solutions, Inc.
 Waggaman, Jefferson Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR						
		A	K	Ka	Kb	Db	Dc	VV	NNN	RRR	A	J	FF	A	F	G	H	HHH	64	68						
EQT0012	Preflash - AMD Preflash Surge Tank					2													1							
EQT0013	Product - AMD Product Surge Tank					2													1							
EQT0014	Reactor Tank - AMD Reactor Wash Hold Tank					2													1							
EQT 0015	14-84 - AMD Storage Tank 1					2													1							
EQT 0016	15-84 - AMD Storage Tank 2					2													1							
EQT 0017	16-84 - AMD Storage Tank 3					2													1							
EQT 0018	17-84 - AMD Storage Tank 4					2													1							
EQT 0019	100-89 - AMD Storage Tank 5					2													1							
EQT 0020	AMD6 - AMD Storage Tank 6					2													1							
EQT 0021	AMD7 - AMD Storage Tank 7					2													1							
EQT 0022	AMD8 - AMD Storage Tank 8					2													1							
EQT 0023	AMD AN Recycle Tank					2													1							

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Acrylamide (AMD) Unit
 Agency Interest No.: 146892
 Kemira Water Solutions, Inc.
 Waggaman, Jefferson Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS						40 CFR 61						40 CFR 63 NESHAP						40 CFR						
		A	K	Ka	Kb	Db	Dc	VV	NNN	RRR	A	J	FF	A	F	G	H	HHH	64	68						
EQT0024	AMD AN Deaerator Tank					2												1								
FUG0002	97-92 - AMD Plant Fugitives	1						1										1								

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Acrylamide (AMD) Unit
Agency Interest No.: 146892
Kemira Water Solutions, Inc.
Waggaman, Jefferson Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT001:19-79	Waste Gas Disposal [LAC 33:III.2115]	DOES NOT APPLY. Meets SOCMI HON applicability criteria
	Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations - Subpart NNN [40 CFR 60.660]	EXEMPT. Meets SOCMI HON applicability criteria.
	Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes – Subpart RRR [40 CFR 60.700]	EXEMPT. Meets SOCMI HON applicability criteria.
CRG001	Storage of Volatile Organic Compounds [LAC 33:III.2103]	EXEMPT. Tank capacities < 39,900 gallons with true vapor pressure < 1.5 psia.
AMD Process Vessels	Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 - Subpart Kb [40 CFR 60.110b]	EXEMPT. Tank capacities < 19,800 gallons, and tank capacities < 39,900 gallons with true vapor pressure < 0.5 psia, and tank capacities >19,800 gallons but < 39,900 gallons with a true vapor pressure less than 2.2 psia.
EQT0007/AMD Rich Tank		
EQT0008/AMD AN Feed Tank		
EQT0010/AMD Stage II Tank		
EQT0011/AMD Lean Tank		
EQT0012/AMD Preflash Tank		
EQT0013/AMD Product Tank		
EQT0014/AMD Reactor Tank		

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

Acrylamide (AMD) Unit
Agency Interest No: 146892
Kemira Water Solutions, Inc.
Waggaman, Jefferson Parish, Louisiana

XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
AMD Process Sump EQT005:90-92	Comprehensive Toxic air Pollutant Emission Control Program [LAC 33:III.Chapter 51]	EXEMPT. Group 2 wastewater.
Tank Truck Bin Washout & Sumps EQT004:93-92	Comprehensive Toxic air Pollutant Emission Control Program [LAC 33:III.Chapter 51]	EXEMPT. Group 2 wastewater.
Loading Seal Pot EQT006/1-02	Volatile Organic Loading [LAC 33: III.2107]	EXEMPT. Comply with 40 CFR 63.130(f).
CRG002 AMD Storage Tanks EQT0015/14-84 EQT0016/15-84 EQT0017/16-84 EQT0018//17-84 EQT0019/100-89 EQT0020/AMD Storage Tank 6 EQT0021/AMD Storage Tank 7 EQT0022/AMD Storage Tank 8 EQT0023/ AMD AN Recycle Tank Deaerator Tank EQT0024/ AMD AN	Storage of Volatile Organic Compounds [LAC 33:III.2103] Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 - Subpart Kb [40 CFR 60.110b]	EXEMPT. Tank capacities 19,800 gallons, and tank capacities 39,900 gallons with true vapor pressure 0.5 psia, and tank capacities 19,800 gallons but < 39,900 gallons with a true vapor pressure less than 2.2 psia.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

**Acrylamide (AMD) Unit
Agency Interest No.: 146892
Kemira Water Solutions, Inc.
Waggaman, Jefferson Parish, Louisiana**

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table I) of this permit.

General Information

AI ID: 146892 Kemira Water Solutions - Acrylamide Unit - AMD Unit
Activity Number: PER20080001
Permit Number: 2107-V1
Air - Title V Regular Permit Renewal

Also Known As:	ID	Name	User Group	Start Date
	1340-00321 LAR000063263	CDS Number Kemira Water Solutions AMD Unit	CDS Number Hazardous Waste Notification	11-20-2006 11-07-2006
	G-051-12636	Kemira Water Solutions - Acrylamide Unit - AMD Unit Site ID #	Multimedia Solid Waste Facility No.	05-27-1993 11-21-2006
Physical Location:		10800 River Rd (portion of) Waggaman, LA 70094	Main Phone:	5044316871
Mailing Address:		10800 River Rd Westwego, LA 70094		
Location of Front Gate:		29.964806 latitude, -90.264686 longitude, Coordinate Method: Lat/Long. - DMS, Coordinate Datum: NAD83		
Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Joe Boroden Shawn Ward Glenn Wharton Glenn Wharton Glenn Wharton Glenn Wharton Jamie Williams Jamie Williams	PO Box 1924 Mobile, AL 36633 10800 River Rd Waggaman, LA 70094 PO Box 1924 Mobile, AL 36633 PO Box 1924 Mobile, AL 36633 PO Box 1924 Mobile, AL 36633 PO Box 1924 Mobile, AL 36633 10800 River Rd Westwego, LA 70094 10800 River Rd Westwego, LA 70094	2516621563 (WP) 5044316871 (WP) 2516621643 (WP) 2516621643 (WP) 2516621626 (WF) 2516621626 (WF) Jamie.williams@cyte 5044316556 (WP)	Responsible Official for Haz. Waste Billing Party for Air Permit Contact For Responsible Official for Responsible Official for Air Permit Contact For Emission Inventory Contact for Emission Inventory Contact for
Related Organizations:	Name	Address	Phone (Type)	Relationship
	Kemira Water Solutions Inc Kemira Water Solutions Inc Kemira Water Solutions Inc Kemira Water Solutions Inc	Fortier Manufacturing Complex Westwego, LA 70094 Fortier Manufacturing Complex Westwego, LA 70094 Fortier Manufacturing Complex Westwego, LA 70094 Fortier Manufacturing Complex Westwego, LA 70094	Operates Emission Inventory Billing Party Air Billing Party for Owns	

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Ms. Tommie Milam, Permit Support Services Division, at (225) 219-3259 or email your changes to facupdate@la.gov.

INVENTORIES
AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit
Activity Number: PER2008001
Permit Number: 2107-V1
Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Acrylamide (AMD) Unit						
EOT 0001	19-79 - AMD Scrubber Stack			34 tons/yr	Catalyst	8760 hr/yr
EOT 0002	2-72 - Reactor Catalyst Dust Separator					49 hr/yr
EOT 0003	95-92 - Ammonia Side Boiler					156 hr/yr
EOT 0004	93-92 - Tank Truck, Tank Car, & Tote Bin Washout and Sumps	150 gallons/min	150 gallons/min			8760 hr/yr
EOT 0005	90-92 - AMD Process Sump	3889 gallons				8760 hr/yr
EOT 0006	1-02 - Loading Seal Pot			513000 gallons/yr		8760 hr/yr
EOT 0007	49-79 - AMD AN Rich Tank	200 gallons				8760 hr/yr
EOT 0008	50-79 - AMD AN Feed Tank	555 gallons				8760 hr/yr
EOT 0009	21-88 - AMD Stage I Aeration Tank	1900 gallons				8760 hr/yr
EOT 0010	22-88 - AMD Stage II Aeration Tank	1900 gallons				8760 hr/yr
EOT 0011	2-89 - AMD Lean Water Tank	500 gallons				8760 hr/yr
EOT 0012	Preflash - AMD Preflash Surge Tank	500 gallons				8760 hr/yr
EOT 0013	Product - AMD Product Surge Tank	14806 gallons				8760 hr/yr
EOT 0014	Reactor Tank - AMD Reactor Wash Hold Tank	20300 gallons				8760 hr/yr
EOT 0015	14-84 - AMD Storage Tank 1	30000 gallons				8760 hr/yr
EOT 0016	15-84 - AMD Storage Tank 2	30000 gallons				8760 hr/yr
EOT 0017	16-84 - AMD Storage Tank 3	30000 gallons				8760 hr/yr
EOT 0018	17-84 - AMD Storage Tank 4	30000 gallons				8760 hr/yr
EOT 0019	100-89 - AMD Storage Tank 5	75000 gallons				8760 hr/yr
EOT 0020	AMD6 - AMD Storage Tank 6	60000 gallons				8760 hr/yr
EOT 0021	AMD7 - AMD Storage Tank 7	120000 gallons				8760 hr/yr
EOT 0022	AMD8 - AMD Storage Tank 8	120000 gallons				8760 hr/yr
EOT 0023	49-79 Recycle - AMD AN Recycle Tank	300 gallons				8760 hr/yr
EOT 0024	49-79 Deaerator - AMD AN Deaerator Tank	300 gallons				8760 hr/yr
FUG 0001	97-92 - Fugitives					8760 hr/yr
Stack Information:						
ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)
Acrylamide (AMD) Unit						
EOT 0001	19-79 - AMD Scrubber Stack	58.9	694	.5		80
EOT 0002	2-72 - Reactor Catalyst Dust Separator		3			77
EOT 0003	95-92 - Ammonia Side Boiler	3.06	1	.08		50
EOT 0004	93-92 - Tank Truck, Tank Car, & Tote Bin Washout and Sumps	.8	1	.7		1
EOT 0005	90-92 - AMD Process Sump	1.6	2	1.5		212
EOT 0006	1-02 - Loading Seal Pot	9.5	50	.33		12
						77
						60
						80

INVENTORIES

AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit
 Activity Number: PER20080001
 Permit Number: 2107-V1
 Air - Title V Regular Permit Renewal

Relationships:

ID	Description	Vents to	Relationship	ID	Description
CRG 0001	- AMD Process Vessels			EQT 0001	19-79 - AMD Scrubber Stack
CRG 0002	Common Requirements Group				
UNF 0001	Common Requirements Group				
UNF 0001	Unit or Facility Wide				

Subject Item Groups:

ID	Group Type	Group Description
CRG 0001	Common Requirements Group	- AMD Process Vessels
CRG 0002	Common Requirements Group	- AMD Storage Tanks
UNF 0001	Unit or Facility Wide	- Acrylamide (AMD) Unit

Group Membership:

ID	Description	Member of Groups
EQT 0007	49-79 - AMD AN Rich Tank	CRG0000000001
EQT 0008	50-79 - AMD AN Feed Tank	CRG0000000001
EQT 0009	21-88 - AMD Stage I Aeration Tank	CRG0000000001
EQT 0010	22-88 - AMD Stage II Aeration Tank	CRG0000000001
EQT 0011	2-89 - AMD Lean Water Tank	CRG0000000001
EQT 0012	Preflash - AMD Preflash Surge Tank	CRG0000000001
EQT 0013	Product - AMD Product Surge Tank	CRG0000000001
EQT 0014	Reactor Tank - AMD Reactor Wash Hold Tank	CRG0000000001
EQT 0015	14-84 - AMD Storage Tank 1	CRG0000000002
EQT 0016	15-84 - AMD Storage Tank 2	CRG0000000002
EQT 0017	16-84 - AMD Storage Tank 3	CRG0000000002
EQT 0018	17-84 - AMD Storage Tank 4	CRG0000000002
EQT 0019	100-89 - AMD Storage Tank 5	CRG0000000002
EQT 0020	AMD6 - AMD Storage Tank 6	CRG0000000002
EQT 0021	AMD7 - AMD Storage Tank 7	CRG0000000002
EQT 0022	AMD8 - AMD Storage Tank 8	CRG0000000002
EQT 0023	49-79 Recycle - AMD AN Recycle Tank	CRG0000000001
EQT 0024	49-79 Deaerator - AMD AN Deaerator Tank	CRG0000000001

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multplier	Units Of Measure
0630	0630 Organic Oxides, Alcohols, Glycols (Rated Capacity)	90	MM lbs/yr

SIC Codes:

2869	Industrial organic chemicals, nec	UNF 001
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EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit

Activity Number: PER20080001

Permit Number: 2107-V1

Air - Title V Regular Permit Renewal

VOC			
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year
Acrylamide (AMD) Unit			
EQT 0001 19.79	0.26	0.31	1.10
EQT 0004 93.92	0.001	0.03	<0.003
EQT 0005 90.92	<0.001	<0.001	<0.001
EQT 0006 1.02	0.28	1.87	1.25
FUG 0001 97.92	0.59	0.59	2.57

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit

Activity Number: PER20080001

Permit Number: 2107-V1

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0001 19-79	Acrylamide	<0.001	<0.001	<0.001
	Acrylonitrile	0.25	0.32	1.10
EQT 0002 2-72	Copper (and compounds)	0.02	0.02	<0.001
EQT 0003 95-92	Ammonia	0.63	0.63	0.008
EQT 0004 93-92	Acrylamide	0.001	0.03	0.003
EQT 0005 90-92	Acrylamide	<0.001	<0.001	<0.001
	Acrylonitrile	<0.001	<0.001	<0.001
EQT 0006 1-02	Acrylamide	0.28	1.87	1.25
	Acrylonitrile	<0.001	<0.001	0.002
FUG 0001 97-92	Acrylamide	0.30	0.30	1.29
	Acrylonitrile	0.14	0.14	0.61
	Ammonia	0.20	0.20	0.86
	Ethylene glycol	0.15	0.15	0.66
UNF 0001	Acrylamide			2.54
	Acrylonitrile			1.71
	Ammonia			0.87
	Copper (and compounds)			<0.001
	Ethylene glycol			0.66

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

SPECIFIC REQUIREMENTS

AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit
Activity Number: PER20080001
Permit Number: 2107-V1
Air - Title V Regular Permit Renewal

CRG 0001 - AMD Process Vessels

Group Members: EQT 0007EQT 0008EQT 0009EQT 0010EQT 0011EQT 0012EQT 0013EQT 0014EQT 0015EQT 0024

1 [40 CFR 63.113(c)]

TRE index value > 4.0 (no units). Subpart G. [40 CFR 63.113(e)]

Which Months: All Year Statistical Basis: None specified

Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Maintain records of measurements, engineering assessments, and calculations performed to determine the TRE index value of the vent stream. Include all data, assumptions and procedures used for the engineering assessments, as specified in 40 CFR 63.115(d)(1). Subpart G. [40 CFR 63.117(b)]

Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]

Submit report: Due within 180 calendar days after a process change, as defined in 40 CFR 63.115(c), is made that causes a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0. Include the information specified in 40 CFR 63.118(h)(1) through (h)(3). Subpart G. [40 CFR 63.118(h)]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ MACT is determined to be the Scrubber.

CRG 0002 - AMD Storage Tanks

Group Members: EQT 0013EQT 0016EQT 0017EQT 0018EQT 0019EQT 0020EQT 0021EQT 0022

6 [40 CFR 63.123(a)]

Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ MACT is determined to be the Scrubber.

EQT 0001 19-79 - AMD Scrubber Stack

8 [40 CFR 63.110(d)]

Group 2 process vent with a TRE value greater than or equal to 1 as determined by the procedures in 40 CFR 60, subpart RRR, the process vent is required to comply with the provisions specified in paragraphs (d)(8)(ii)(A) through (d)(8)(ii)(D). [40 CFR 63.110(d)]

Group 2 process vent with a TRE value greater than or equal to 1 as determined by the procedures in 40 CFR 60, subpart NNN, the process vent is required to comply with the provisions specified in paragraphs (d)(5)(ii)(A) through (d)(5)(ii)(D). [40 CFR 63.110(d)]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records specified in 40 CFR 63.147(a) through (l), as applicable. Subpart G.

Flow rate >= 0.21 gallons/min.

Which Months: All Year Statistical Basis: None specified

Flow rate recordkeeping by electronic or hard copy once every four hours.

AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit
Activity Number: PER20080001
Permit Number: 2107-V1
Air - Title V Regular Permit Renewal

Group Members: EQT 0007EQT 0008EQT 0009EQT 0010EQT 0011EQT 0012EQT 0013EQT 0014EQT 0015EQT 0024

1 [40 CFR 63.113(c)]

TRE index value > 4.0 (no units). Subpart G. [40 CFR 63.113(e)]

Which Months: All Year Statistical Basis: None specified

Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Maintain records of measurements, engineering assessments, and calculations performed to determine the TRE index value of the vent stream. Include all data, assumptions and procedures used for the engineering assessments, as specified in 40 CFR 63.115(d)(1). Subpart G. [40 CFR 63.117(b)]

Equipment/operational data recordkeeping by electronic or hard copy upon occurrence of event. Keep up-to-date, readily accessible records of any process changes as defined in 40 CFR 63.115(e), and any recalculation of the TRE index value pursuant to 40 CFR 63.115(e). Subpart G. [40 CFR 63.118(c)]

Submit report: Due within 180 calendar days after a process change, as defined in 40 CFR 63.115(c), is made that causes a Group 2 process vent with a TRE greater than 4.0 to become a Group 2 process vent with a TRE less than 4.0. Include the information specified in 40 CFR 63.118(h)(1) through (h)(3). Subpart G. [40 CFR 63.118(h)]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ MACT is determined to be the Scrubber.

CRG 0002 - AMD Storage Tanks

Group Members: EQT 0013EQT 0016EQT 0017EQT 0018EQT 0019EQT 0020EQT 0021EQT 0022

6 [40 CFR 63.123(a)]

Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. Keep the records as long as the storage vessel retains Group 2 status and is in operation. Subpart G. [40 CFR 63.123(a)]

Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ MACT is determined to be the Scrubber.

EQT 0001 19-79 - AMD Scrubber Stack

8 [40 CFR 63.110(d)]

Group 2 process vent with a TRE value greater than or equal to 1 as determined by the procedures in 40 CFR 60, subpart RRR, the process vent is required to comply with the provisions specified in paragraphs (d)(8)(ii)(A) through (d)(8)(ii)(D). [40 CFR 63.110(d)]

Group 2 process vent with a TRE value greater than or equal to 1 as determined by the procedures in 40 CFR 60, subpart NNN, the process vent is required to comply with the provisions specified in paragraphs (d)(5)(ii)(A) through (d)(5)(ii)(D). [40 CFR 63.110(d)]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records specified in 40 CFR 63.147(a) through (l), as applicable. Subpart G.

Flow rate >= 0.21 gallons/min.

Which Months: All Year Statistical Basis: None specified

Flow rate recordkeeping by electronic or hard copy once every four hours.

SPECIFIC REQUIREMENTS**AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit****Activity Number: PER20080001****Permit Number: 2107-V1****Air - Title V Regular Permit Renewal****EQT 0001 19-79 - AMD Scrubber Stack**

13 [LAC 33:III.507.H.1.a]

Flow rate monitored by flow rate monitoring device once every four hours.
Which Months: All Year Statistical Basis: None specified**EQT 0003 95-92 - Ammonia Side Boiler**

14 [LAC 33:III.5107.A.2]

Emits Class III TAP only. Chapter 51 MACT is not required. Include emissions of all toxic air pollutants listed in LAC 33:III.5112, Table 51.1 or 51.3 in the Annual Emissions Report unless exempted under LAC 33:III.5105.B.

EQT 0004 93-92 - Tank Truck, Tank Car, & Tote Bin Washout and Sumps

15 [40 CFR 63.147]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records specified in 40 CFR 63.147(a) through (f), as applicable. Subpart G.

EQT 0005 90-92 - AMD Process Sump

16 [40 CFR 63.147]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Maintain records specified in 40 CFR 63.147(a) through (f), as applicable. Subpart G.

EQT 0006 1-02 - Loading Seal Pot

17 [40 CFR 63.130(f)]

Equipment/operational data recordkeeping by electronic or hard copy annually. Keep records of the information specified in 40 CFR 63.130(f)(1) through (f)(3). Subpart G. [40 CFR 63.130(f)] Control emissions of toxic air pollutants to a degree that constitutes Maximum Achievable Control Technology (MACT) as approved by DEQ. MACT is determined to be Scrubber.

FUG 0001 97-92 - Fugitives

SPECIFIC REQUIREMENTS**AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit****Activity Number: PER20080001****Permit Number: 2107-V1****Air - Title V Regular Permit Renewal****FUG 0001 97-92 - Fugitives**

19 [LAC 33:III.501.C.6]

Comply with LAC 33:III.2121, LAC 33:III.5109, 40 CFR 60.480 Subpart VV, 40 CFR 63.160 Subpart II, and RCRA BB by implementing the Louisiana Consolidated Fugitive Emission Program Guidelines. Compliance is achieved through compliance with 40 CFR 63.160 Subpart H - National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks.

Permittee shall comply with a streamlined equipment leak monitoring program. Compliance with the streamlined program in accordance with this specific condition shall serve to comply with each of the fugitive emission monitoring programs being streamlined, as indicated in the following table. Non-compliance with the streamlined program in accordance with this specific condition may subject the permittee to enforcement action for one or more of the applicable fugitive emissions programs.

- i) Permittee shall apply the streamlined program to the combined universe of components subject to any of the programs being streamlined. Any component type which does not require periodic monitoring under the overall most stringent program (LAC 33:III. Chapter 51) shall be monitored as required by the most stringent requirements of any other program being streamlined and will not be exempted. The streamline program will include any exemptions based on size of component available in any of the programs being streamlined.
- ii) Permittee shall use leak definitions and monitoring frequency based on the overall most stringent program. Percent leaker performance shall be calculated using the provisions of the overall most stringent program. Annual monitoring shall be defined as once every four quarters. Some allowance may be made in the first year of the streamlined program in order to allow for transition from existing monitoring schedules.
- iii) Permittee shall comply with recordkeeping and reporting requirements of the overall most stringent program. Semiannual reports shall be submitted on February 28 and August 31, to cover the periods July 1 through December 31 and January 1 through June 30, respectively. The semiannual reports shall include any monitoring performed within the reporting periods.

UNF 0001 - Acrylamide (AMD) Unit

- 20 [40 CFR 60.]
 21 [40 CFR 61.357(a)]
- 22 [40 CFR 61.]
 23 [40 CFR 63.]
 24 [40 CFR 70.5(a)(1)(iii)]

All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
 Submit report: Due within 90 days after January 7, 1993. Submit a report that summarizes the regulatory status of each waste stream subject to 40 CFR 61.342 and is determined by the procedures specified in 40 CFR 61.355(c) to contain benzene. Include the information specified in 40 CFR 61.357(a)(1) through (a)(4). If there is no benzene onsite in wastes, products, by-products, or intermediates, submit an initial report that is a statement to this effect. Subpart FF. [40 CFR 61.357(a)]
 All affected facilities shall comply with all applicable provisions in 40 CFR 61 Subpart A.
 All affected facilities shall comply with all applicable provisions in 40 CFR 63 Subpart A as delineated in Table xx of 40 CFR 63 Subpart xx.
 Submit Title V permit application for renewal: Due 180 calendar days before permit expiration date. [40 CFR 70.5(a)(1)(iii)]

SPECIFIC REQUIREMENTS**AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit****Activity Number: PER20080001****Permit Number: 2107-V1****Air - Title V Regular Permit Renewal****UNF 0001 - Acrylamide (AMD) Unit**

- 25 [40 CFR 70.6(a)(3)(iii)(A)] Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 26 [40 CFR 70.6(c)(5)(iv)] Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
- 27 [LAC 33:III.1103] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 28 [LAC 33:III.1109.B] Outdoor burning of waste material or other combustible material is prohibited.
- 29 [LAC 33:III.1303.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 30 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 31 [LAC 33:III.2119] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 32 [LAC 33:III.2901.D] Discharges of odorous substances at or beyond property lines which cause a perceived odor intensity of six or greater on the specified eight point butanol scale as determined by Method 41 of LAC 33:III.2901.G are prohibited.
- 33 [LAC 33:III.2901.F] If requested to monitor for odor intensity, take and transport samples in a manner which minimizes alteration of the samples either by contamination or loss of material. Evaluate all samples as soon after collection as possible in accordance with the procedures set forth in LAC 33:III.2901.G.
- 34 [LAC 33:III.501.C.1] Submit permit application: Due prior to construction, reconstruction or modification unless otherwise provided in LAC 33:III.Chapter 5.
- 35 [LAC 33:III.501.C.2] Submit a timely and complete permit application to the Office of Environmental Services as required in accordance with the Procedures in LAC 33:III.Chapter 5.
- No construction, modification, or operation of a facility which ultimately may result in an initiation or increase in emission of air contaminants as defined in LAC 33:III.111 shall commence until the permit application has been approved, an appropriate permit fee paid (in accordance with LAC 33:III.Chapter 2), and a permit (certificate of approval) has been issued by the permitting authority.
- 36 [LAC 33:III.501.C.4] Operate the source in accordance with all terms and conditions of this permit.
- 37 [LAC 33:III.501.C.6] Comply with terms and conditions incorporated in the permit to ensure compliance with all state and federally applicable air quality requirements and standards at the source, and such other permit terms and conditions as determined by the permitting authority to be reasonable and necessary.
- 38 [LAC 33:III.507.A.1.a] Any major source as defined in LAC 33:III.502 is designated a Part 70 source and is required to obtain a permit which will meet the requirements of LAC 33:III.507.

SPECIFIC REQUIREMENTS**AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit****Activity Number: PER20080001****Permit Number: 2107-V1****Air - Title V Regular Permit Renewal****UNF 0001 - Acrylamide (AMD) Unit**

39 [LAC 33:III.507.B.2]

No Part 70 source may operate after the time that the owner or operator of such source is required to submit a permit application under Subsection C of this Section, unless an application has been submitted by the submittal deadline and such application provides information addressing all applicable sections of the application form and has been certified as complete in accordance with LAC 33:III.517.B.1. No Part 70 source may operate after the deadline provided for supplying additional information requested by the permitting authority under LAC 33:III.519, unless such additional information has been submitted within the time specified by the permitting authority. Permits issued to the Part 70 source under this Section shall include the elements required by 40 CFR 70.6. The Louisiana Department of Environmental Quality hereby adopts and incorporates by reference the provisions of 40 CFR 70.6(a), as in effect on July 21, 1992. Upon issuance of the permit, the Part 70 source shall be operated in compliance with all terms and conditions of the permit. Noncompliance with any federally applicable term or condition of the permit shall constitute a violation of the Clean Air Act and shall be grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.

Any permit application to renew an existing permit shall be submitted at least six months prior to the date of permit expiration, or at such earlier time as may be required by the existing permit or approved by the permitting authority. In no event shall the application for permit renewal be submitted more than 18 months before the date of permit expiration.

Submit notification: Due to the permitting authority prior to the initiation of any project which will result in emission reductions. Include in the notification a description of the proposed action, a location map, a description of the composition of air contaminants involved, the rate and temperature of the emissions, the identity of the sources involved and the change in emissions. Make any appropriate permit revision reflecting the emission reduction no later than 180 days after commencement of operation and in accordance with the procedures of LAC 33:III.Chapter 5. Submit permit application: Due prior to commencement of construction, reconstruction, or modification of the source, for new or modified sources. Do not commence construction, reconstruction, or modification of any source required to be permitted under LAC 33:III.Chapter 5 prior to approval by the permitting authority.

Any application form, report, or compliance certification submitted under this Chapter shall contain certification by a responsible official of truth, accuracy, and completeness. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the application are true, accurate, and complete.

Submit supplementary facts or corrected information: Due promptly upon becoming aware of failure to submit or incorrect submittal regarding permit applications. In addition, provide information as necessary to address any requirements that become applicable to the source after the date of filing a complete application but prior to release of a proposed permit.

Submit applications for permits in accordance with forms and guidance provided by the DEQ. At a minimum, each permit application submitted under LAC 33:III.Chapter 5 shall contain the information specified in LAC 33:III.517.D, subparagraphs 1-18. In addition to those elements listed under LAC 33:III.517.D, include in each application pertaining to a Part 70 source the information specified in LAC 33:III.517.E, Subparagraphs 1-8.

Submit change of ownership notification in accordance with LAC 33:III.517.G.

Submit permit modification application: Due within 45 days of obtaining relevant test results. The permit modification or amendment shall include all information necessary to process the request, and is required if testing demonstrates that the terms and conditions of the existing permit are inappropriate or inaccurate.

SPECIFIC REQUIREMENTS**AI ID: 146892 - Kemira Water Solutions - Acrylamide Unit - AMD Unit****Activity Number: PER20080001****Permit Number: 2107-V1****Air - Title V Regular Permit Renewal****UNF 0001 - Acrylamide (AMD) Unit**

- 49 [LAC 33:III.523.B.2] Submit application for temporary exemption for testing: Due prior to test initiation. Submit the information specified in LAC 33:III.517 (with the exception of the data being measured in the test). Conduct testing for the minimum duration consistent with obtaining valid results.
- 50 [LAC 33:III.523.B.3] Submit test results: Due within 30 days of test completion to the administrative authority. The report details the conditions that were found to exist during a temporary exemption for testing. State if there is to be no permanent change in emissions from pretest conditions.
- 51 [LAC 33:III.535] Comply with the Part 70 General Conditions as set forth in LAC 33:III.535 and the Louisiana General Conditions as set forth in LAC 33:III.537. [LAC 33:III.535, LAC 33:III.537]
- 52 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert.
- 53 [LAC 33:III.5609.A.2.b] Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning.
- 54 [LAC 33:III.5609.A.3.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency.
- 55 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.
- 56 [LAC 33:III.5611.A] Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7.
- 57 [LAC 33:III.5611.B] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority.
- 58 [LAC 33:III.919.D] During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.
- 59 [LAC 33:III.927] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D. Report the unauthorized discharge of any air pollutant into the atmosphere in accordance with LAC 33:1.Chapter 39, Notification Regulations and Procedures for Unauthorized Discharges. Submit written reports to the department pursuant to LAC 33:1.3925. Submit timely and appropriate follow-up reports detailing methods and procedures to be used to prevent similar atmospheric releases.